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5 Pro se plaintiff
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11 **IN THE US DISTRICT COURT**
12 **FOR THE NORTHERN DISTRICT OF TEXAS**
13 **DALLAS DIVISION**
14

15 DR. ORLY TAITZ, ESQ

16 Plaintiff,

17 vs.

18 KATHLEEN SEBELIUS,

19 In her capacity of Secretary of
20 Health and Human Services et.al.

21 Defendant.
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23

) Case No.: **3:12-cv-03251-P**

)
) VIOLATION OF 14TH AMENDMENT
) EQUAL PROTECTION RIGHTS,
) ESTABLISHMENT CLAUSE
) ARTICLE 2 SEC 1 OF COSTITUTION
) INJUNCTIVE RELIEF, STAY
) DECLARATORY RELIEF
RICO, PREDECATE CRIMES:
FRAUD, AIDING AND ABETTING
FORGERY AND UTTERING OF
FORGED DOCUMENTS TO
COMMIT ELECTIONS FRAUD

7TH AMENDMENT JURY
DEMANDED

24 **REPLY TO ORDER TO JUSTIFY VENUE**
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27 **BACKGROUND**
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1 The case Taitz v Sebelius et. al was originally filed in the U.S. District Court
2 Central District of California on July5, 2012. The complaint Challenges the
3 constitutionality of the Patient Protection and Affordable Act 26 USC 5000A. On
4 August 16, 2012 the District Judge Dolly M. Gee dismissed the case without
5 prejudice for lack of venue. Plaintiff re-filed the Complaint in Northern District of
6 Texas due to the fact that one of the non-federal defendants William Chatfield
7 resides in Northern District of Texas, Dallas Division.
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13 **Argument**

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15 In her decision from August 16, 2012, the District Judge Gee ordered to dismiss
16 the Complaint without prejudice for lack of venue on the basis that none of the any
17 non-federal defendant reside in the Central District of California.
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19 28 U.S.C. § 1391(e)(1)(C) states that Non-federal defendants may be joined in
20 such a civil action if the plaintiff demonstrates that venue is proper for such non-
21 federal defendants under “other venue requirements as would be applicable if the
22 United States or one of its officers, employees, or agencies were not a party.”In her
23 decision, Judge Gee pointed that Defendant William Chatfield is a non-federal
24 defendant and does not reside in CA, Exhibit 1 Ruling by Judge Gee. Due to the
25 fact that defendant Chatfield resides in the Northern District of TX, Plaintiff Taitz
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1 properly re-filed the case in the Northern District of TX. The venue is proper. As
2 the complaint was originally filed on July 5th and all the parties were served on
3 July 5, 2012, and current complaint was refilled in order to change venue, Taitz is
4 requesting an expedited Motion hearing on her motion to stay Healthcare penalties/
5 Healthcare tax, which was originally scheduled in CA on August 10th and had to be
6 rescheduled. This case has national importance and expedited hearing is warranted.
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9 Respectfully submitted



11 /s/ Dr. Orly Taitz ESQ
12 08.31.2012

Proof of Service

I, Yulia Yun, over 18 years old and not a party to this case, declare under penalty of perjury that I served the copy of the above pleadings on the parties by sending a true and correct copy of the above documents in by the US mail at the addresses below:

Kathleen Sebelius
Via the Office of the U.S. District Attorney
For Northern District of Texas
1100 Commerce st. 3rd floor
Dallas, TX 75242

Barack Hussein Obama
Via the Office of the U.S. District Attorney
For Northern District of Texas
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Michael Astrue
Via the Office of the U.S. District Attorney
For Northern District of Texas
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Eric Holder
Via the Office of the U.S. District Attorney
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William Chatfield
1517 Bonham CT
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Nancy Pelosi
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Yulia Yun

08/31/12

